2019 Consolidated Annual Performance and Evaluation Report (CAPER)

5th Year of the 2015-2019 Consolidated Plan
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Introduction

The Consolidated Annual Performance and Evaluation Report (CAPER) is a step in the U. S. Department of Housing and Urban Development’s Consolidated Plan process for use of the Community Development Block Grant and HOME Investment Partnership Program grant funds. The Consolidated Plan provides a framework for formulation of a Five-Year Strategic Plan for the City to assess affordable housing and community development needs and market conditions, identify activities to address the needs and conditions, and then target federal funds to the identified needs. Annual Action Plans then describe activities that will implement goals identified in the Strategic Plan. The CAPER is the annual report on accomplishments and progress made toward the most current year’s Action Plan goals following completion of the City’s program year. This CAPER is for 2019 and is the fifth and final report on the Consolidated Plan for 2015-2019.

Use of the grants is described briefly below:

- The **Community Development Block Grant** (CDBG): May be used for a wide range of community development needs that are to benefit low- moderate-income residents of the City through the provision of decent, affordable housing; suitable living environments; and expansion of economic opportunities; or for clearance of blight.

- The **HOME Investment Partnership Program** (HOME) grant is exclusively for the creation of affordable housing for low- moderate-income households.

The majority of the CDBG funds and all HOME funds must have beneficiaries that earn 80% or less of the Area Median Income (AMI) for the Greeley Metropolitan Statistical Area (MSA), which encompasses all of Weld County. The “beneficiary” may be a neighborhood, an individual, or a household. The AMI for the Greeley MSA, set annually by HUD, was $79,188 for a family of four in 2019. By HUD definition, “moderate income” is between 51% and 80% of AMI; “low income” is 31%-50% of AMI; and “poverty level income” 30% or less of AMI.

Grant awards from HUD in 2019 were $824,255 (CDBG) and $390,658 (HOME). Both awards were decreases from the 2018 awards of $860,683 (CDBG) and $418,361 (HOME). There was also income generated through the Housing Rehabilitation Revolving Loan Program and program income from a closed revolving loan program.

Reporting to HUD and draws against the grants are done online through the Integrated Disbursal and Information System (IDIS). (A “draw” is the City reimbursing itself for CDBG or HOME expenses by “drawing down” the grant funds from the U. S. Treasury through the IDIS system.) The City must respond to specific questions for each step of the Consolidated Planning process: Five-year Strategic Plan, Annual Action Plan, and the CAPER. Terminology may not be familiar to the public; definitions or further explanation of any information in the CAPER is available from the Greeley Urban Renewal Authority (970-350-9380) during the office hours of 9:00 a.m. to 4:00 p.m. The CAPER in a form other than written English may be provided upon request by contacting GURA.
CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The activities noted below are those on which funds were drawn or which had significant progress in 2019. They are the last activities to implement the goals of the 2015-2019 Consolidated Plan.

Infrastructure

- **Redevelopment District Infrastructure Phases 2 and 3-Central Greeley** – Curbs, gutters, sidewalks, and ramps issues were addressed. Phase 2 (2018) was completed, and the city continued the multi-year activity with Phase 3 (2019), which will be completed in 2020. The targeted area for both years was between 23rd and 11th Avenues and 11th and 13th Streets. The 2019 activity specifically targeted 21st Avenue in front of Maplewood Elementary School and addressed drainage issues in addition to the other infrastructure noted.

- **Parkway Tree Planting** – Twenty-eight properties received one or more trees, with 48 trees planted during 2019.

- **Alley Reconstruction** – Twelve gravel alleys were reconstructed using asphalt millings. Reconstruction improves the appearance of the alleys (and thus the neighborhoods), reduces dust, and improves safety. Wear and tear on sidewalks should also be reduced with the absence of gravel.

- **Street Light Installation** – Thirty-two streetlights were installed in low-moderate-income neighborhoods for safety improvements.

Affordable Housing

- Four low-moderate-income households received a housing rehab loan; six low-very low-income households received a housing rehab grant.

- Four new construction, single-family houses in the Crestview Subdivision, with HOME assistance provided through Greeley-Weld Habitat for Humanity, sold to low-moderate-income buyers.

- Compromised flooring was replaced at the Twin Rivers, a multi-family housing development for persons with disabilities. Safety of the residents was of concern due to the flooring condition.

Property Conditions

- The annual clean-up weekend activity was held in April.

Public Services and Facilities that Addressed an Essential Need

- The **Greeley Transitional House (GTH) and Catholic Charities (Guadalupe Community Center)**, both of which service the homeless, continued to support staff who worked with homeless families (GTH) and single men and women (Guadalupe) on housing issues. The service also includes working with landlords and providing tenant education. The goal for all is self-sufficiency. Staff was also supported at the Cold Weather Shelter, and CDBG assisted Senior
Resource Services in providing free transportation for seniors.

- **North Colorado Health Alliance** and a number of community partners continued the Community Action Collaborative, a service that helps connect 9-1-1 callers with non-emergency issues to services and housing. Three hundred fifty-six unduplicated people were assisted.
- **Senior Resource Services** provided free transportation services to seniors.

**Public Services and Facilities that Addressed a Non-Essential Need**

- Final draws on the improvements to access for persons with disabilities and an extensive rehabilitation to the entryway were completed at the Rodarte Center, a public facility in a low-income neighborhood of northeast Greeley. The activity addressed safety concerns. The Rodarte Center provides (in part) after school and recreational opportunities for children and other residents.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.
<table>
<thead>
<tr>
<th>Goal</th>
<th>Category</th>
<th>Source / Amount</th>
<th>Indicator</th>
<th>Unit of Measure</th>
<th>Expected – Strategic Plan</th>
<th>Actual – Strategic Plan</th>
<th>Percent Complete</th>
<th>Expected – Program Year</th>
<th>Actual – Program Year</th>
<th>Percent Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOME Program - homeownership</td>
<td>Affordable Housing</td>
<td>HOME: $</td>
<td>Homeowner Housing Added</td>
<td>Household Housing Unit</td>
<td>15</td>
<td>20</td>
<td>100% +</td>
<td>5</td>
<td>4</td>
<td>80%</td>
</tr>
<tr>
<td>HOME Program - Rental housing</td>
<td>Affordable Housing</td>
<td>HOME: $</td>
<td>Rental units constructed</td>
<td>Household Housing Unit</td>
<td>0</td>
<td>5</td>
<td>NA</td>
<td>0</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td>Homeownership - Reconstruction of housing-HAPP</td>
<td>Affordable Housing</td>
<td>CDBG: $</td>
<td>Homeowner Housing Added</td>
<td>Household Housing Unit</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td>Homeownership - Reconstruction of housing-HAPP</td>
<td>Affordable Housing</td>
<td>CDBG: $</td>
<td>Homeowner Housing Rehabilitated</td>
<td>Household Housing Unit</td>
<td>2</td>
<td>3</td>
<td>100% +</td>
<td>1</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Non-profit public services</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
<td>Persons Assisted</td>
<td>75</td>
<td>380</td>
<td>100% +</td>
<td>20</td>
<td>478</td>
<td>100% +</td>
</tr>
<tr>
<td>Program Type</td>
<td>CDBG:</td>
<td>Homeless Person Overnight Shelter</td>
<td>Persons Assisted</td>
<td>0</td>
<td>1,403</td>
<td>NA</td>
<td>0</td>
<td>373</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
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<tr>
<td>Non-profit public services</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property acquisition, demo, clearance, disposition</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Housing Community Development</td>
<td></td>
<td>Rental units constructed</td>
<td>Household Housing Unit</td>
<td>30</td>
<td>0</td>
<td>0.00%</td>
<td>2 properties or 12 people</td>
<td>0</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>(No Action Plan Goal #)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Public facilities</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Public Facilities</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OMB Control No: 2506-0117 (exp. 06/30/2018) CAPER 7
<table>
<thead>
<tr>
<th>Public improvements</th>
<th>Non-Housing Community Development</th>
<th>CDBG: $</th>
<th>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit</th>
<th>Persons Assisted</th>
<th>21,000</th>
<th>90,900</th>
<th>100% +</th>
<th>4,200</th>
<th>46,205</th>
<th>100% +</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Service-Property Conditions</td>
<td>Non-Housing Community Development</td>
<td>CDBG: $</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
<td>Persons Assisted</td>
<td>10,500</td>
<td>9,939</td>
<td>95%</td>
<td>2,100</td>
<td>3,299</td>
<td>100% +</td>
</tr>
<tr>
<td>SF, owner-occupied housing rehab emergency grants</td>
<td>Affordable Housing</td>
<td>CDBG: $</td>
<td>Homeowner Housing Rehabilitated Household Housing Unit</td>
<td>40</td>
<td>23</td>
<td>58%</td>
<td>8</td>
<td>6</td>
<td>75%</td>
<td></td>
</tr>
<tr>
<td>Single-family, owner-occupied housing rehab loans</td>
<td>Affordable Housing</td>
<td>CDBG: $</td>
<td>Homeowner Housing Rehabilitated Household Housing Unit</td>
<td>25</td>
<td>20</td>
<td>80%</td>
<td>5</td>
<td>4</td>
<td>80%</td>
<td></td>
</tr>
</tbody>
</table>

Table 1 - Accomplishments – Program Year & Strategic Plan to Date
Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City addressed its **high** priorities in the following manner:

1. **Public Improvements (CDBG)**
   a. Several activities addressed the public improvements priority. A 3rd phase of infrastructure improvements in the Redevelopment District was implemented in 2019 and the 2018 activity was completed. The 3rd phase placed a new storm sewer line, inlet, and one outlet into an area drainage pond; installed some new sidewalk on both sides of the 21st Avenue, which is across from Maplewood Elementary School. The phase was approximately 41% complete at yearend. In the same vicinity, alleys were reconstructed, taking them from gravel to re-purposed asphalt. Aside from the physical work done, teachers at the school made contact with city Public Works staff and asked them to speak to the students about city jobs involved in the work that may not need a college education. Public Works staff is also working with the school for potential student artwork to be installed after completion of the activity.
   b. Tree planting in the parkways of the Redevelopment District also continued.
   c. Streetlights were installed in a number of low-income neighborhoods within the District.

2. **Creation and maintenance of affordable housing**
   a. Maintaining affordable housing was addressed with CDBG through the continuation of the Single-family Housing Rehabilitation programs (loans and grants) and with rehabilitation to a multi-family development of affordable housing.
   b. Habitat for Humanity (HOME-homeownership) constructed and sold four houses to qualified buyers, addressing the need for additional units of affordable housing.

3. **Property Acquisition**
   a. No properties were acquired.

Priorities that the City ranked **medium** (but which are part of the “low” priorities in IDIS) included the following:

1. Property conditions – 2019 Clean-up Weekend (CDBG) was held in April.
2. There were no 2019 activities for public facilities that addressed an essential need.
3. CDBG funds supported public service activities through the North Colorado Health Alliance, Greeley Transitional House (shelter and services for homeless families), Catholic Charities (shelter and service homeless persons), and Senior Resource Services (transportation for seniors). North Colorado Health Alliance provides services to persons calling 911 with non-emergency needs.

**Low priorities** (City ranking):

1. There were no public services or facilities that addressed a non-essential need assisted during 2019.
The City allocated a majority percentage (approximately 95%) of its 2019 grant for activities that included infrastructure improvements, affordable housing, and property acquisition, the highest priorities of the 2015-2019 Consolidated Plan.

Draws in 2019 included $44,050.98 for 2018 expenses. Additionally, there will be final draws of 2019 expenses in 2020 in the amount of $61,614.13 (subject to finalization of the City audit).

**CR-10 - Racial and Ethnic composition of families assisted**

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

**Direct Benefit Activities:** The City tracked demographics for households directly benefiting from the CDBG and HOME grant programs, including race, ethnicity, family size, and (in most cases), which had female heads of households or a disability. The information is used for IDIS reporting and also (in the case of housing activities) for fair housing statistics. Direct benefit activities utilizing CDBG funds included:

- Housing activities (rehab loans and grants)
- Public services (case manager support at two shelters, Community Action Collaborative; Senior Resource Services; Cold Weather Shelter)
- Multi-family rehab

Demographic data is also collected for Habitat for Humanity-produced housing (HOME funds) and during the monitoring of developments with HOME units.

<table>
<thead>
<tr>
<th>Direct Benefit Activities</th>
<th>CDBG</th>
<th>HOME</th>
<th>HOME rental units monitored</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>758</td>
<td>3</td>
<td>15</td>
</tr>
<tr>
<td>Black or African American</td>
<td>23</td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>Asian</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian or American Native</td>
<td>30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other multi-race</td>
<td>47</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>870</strong></td>
<td><strong>4</strong></td>
<td><strong>19</strong></td>
</tr>
<tr>
<td>Hispanic</td>
<td>230</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>570</td>
<td>1</td>
<td>9</td>
</tr>
</tbody>
</table>

Table 2 – Table of assistance to racial and ethnic populations by source of funds

**In-Direct Benefit Activities:** Activities with in-direct benefits are those that benefit an area, rather than an individual. LM Universe is total population; LM Area is population having low-moderate-income.
Narrative

Greeley tracks the benefit to persons identifying with the Hispanic ethnicity due to the large number of Hispanic persons in the city. As a recipient of the federal grants, the City is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficient (LEP) persons who want to access programs and activities. “Reasonable effort” includes conducting a Four-Factor Analysis to identify minorities with a high incidence of limited English proficiency and then development of a written Language Assistance Plan. The City’s Four Factor Analysis identified the Hispanic ethnicity as the only minority group with a large percentage of persons in Greeley. The Analysis data is supported by the Demographic and Housing Estimates in the U. S. Census Bureau’s 2013-2017 American Community Survey 5-year Estimates (ACS), which shows the White, Non-Hispanic population in Greeley at 55% and the Hispanic population at 39.4%. All other races in Greeley are represented by a percentage of less than 2% per race, according to the ACS data.

<table>
<thead>
<tr>
<th>CDBG Indirect Benefit Activities</th>
<th>LM Universe</th>
<th>LM Area</th>
<th>% LMI</th>
<th>% Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Redevelopment District Infrastructure Ph 2-Central Greeley (2019 completion)</td>
<td>3,345</td>
<td>2,495</td>
<td>74.59%</td>
<td>38.79%</td>
</tr>
<tr>
<td>Redevelopment District Infrastructure Ph 3-Central Greeley (2019 start)</td>
<td>3,610</td>
<td>2,200</td>
<td>60.94%</td>
<td>38.78%</td>
</tr>
<tr>
<td>Alley reconstruction</td>
<td>6,070</td>
<td>4,045</td>
<td>66.64%</td>
<td>59.48%</td>
</tr>
<tr>
<td>Street light installation</td>
<td>21,005</td>
<td>14,780</td>
<td>70.36%</td>
<td>59.09%</td>
</tr>
<tr>
<td>Trees in Parkways</td>
<td>12,175</td>
<td>8,975</td>
<td>73.72%</td>
<td>37.22%</td>
</tr>
<tr>
<td>Clean-up Weekend</td>
<td>72,960</td>
<td>39,240</td>
<td>5378%</td>
<td>39.40%</td>
</tr>
</tbody>
</table>

Table 2b – Table of assistance to racial and ethnic populations by source of funds – CDBG area benefit activities
CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

<table>
<thead>
<tr>
<th>Source of Funds</th>
<th>Source</th>
<th>Resources Made Available</th>
<th>Amount Expended During Program Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>Grant funds available at 1/1/19 Added 2019 grant</td>
<td>295,272.56 824,255.00</td>
<td>44,050.98* 590,133.51 61,614.13**</td>
</tr>
<tr>
<td>Program Income</td>
<td>Program income beginning balance Added PI</td>
<td>360,395.49 99,401.66</td>
<td>308,450.43</td>
</tr>
<tr>
<td>Rehab RLF</td>
<td>Program income beginning balance Added RLF</td>
<td>175,762.08 62,034.13</td>
<td>38,594.02</td>
</tr>
<tr>
<td>HOME</td>
<td>Grant funds available at 1/1/19 Added 2019 grant</td>
<td>633,407.13 390,658.00</td>
<td>83,646.47</td>
</tr>
<tr>
<td>Program Income</td>
<td>Program income beginning balance Added PI</td>
<td>306,198.30 19,678.34</td>
<td>60,343.43</td>
</tr>
</tbody>
</table>

Table 3 - Resources Made Available

Narrative

Refer to table above. Expenses were balanced to IDIS Report PR05-Drawdown Report by Project and Activity for what were listed in that report as 2019 draws. Note the following:

- $44,050.98(*) drawn in 2019 were for 2018 expenses
- $590,133.51 were 2019 draws for 2019 expenses
- $61,614.13(**) in 2019 expenses will be drawn with the first 2020 draw
- Total expended for 2019 activities = $651,747.64

Resources available to the City during 2019 included unallocated grant funds from prior years, 2019 grant funds, CDBG program income (including funds originally receipted as Revolving Loan Funds, now a closed program), Revolving Loan Fund payments (housing rehab) and HOME program income. Because the City’s fiscal year may not be completely closed out when the CAPER is due for submittal, there may be adjustments needed.
Identify the geographic distribution and location of investments

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Planned Percentage of Allocation</th>
<th>Actual Percentage of Allocation</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Redevelopment District-</td>
<td>85%</td>
<td>86%</td>
<td>Not included in the percentage within the Redevelopment District are public service activities that serve any low-income or homeless person in the community. If those activities were included, the percentage would obviously increase.</td>
</tr>
<tr>
<td>Comprehensive</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Identify the geographic distribution and location of investments

**Narrative**

There are 38 census tracts within Greeley boundaries. Eleven have a percentage of low-moderate-income residents that exceeds 51% (1, 2, 4.02, 5.01, 5.02, 7.01, 7.03, 8, 10.3, 10.4, 13), thirteen if CT 6 and 7.05 are counted (far NE corner; very few residents). Additionally, there are block groups with more than 51% of the residents earning low-moderate-incomes (if looked at alone and not as a part of the entire census tract): BG 3 in CT 10.05; BGs 1, 3, and 4 in CT 11; and BG 1 in CT 12.01. Greeley’s low-moderate-income census tracts are east of 35th Avenue and are included in the Redevelopment District. There are no census tracts west of 35th Avenue in Greeley with a LMI percentage greater than 51%.

**Leveraging**

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

**CDBG** – Applications with a match from the agency requesting funds are viewed most favorably. Those matching dollars are generally from agency fund raising events and include private, corporate, and foundation donations. When available, the City matches its activities with Quality of Life funds or Sales Tax Dollars (local programs).

**HOME** – The increase to available HOME match during 2019 was from Habitat for Humanity, which provided match in a number of ways, including donated goods, private funds, donations from corporations and foundations, etc. At this time, volunteer hours are not counted as match, although they could be.
## Fiscal Year Summary – HOME Match

1. Excess match from prior Federal fiscal year $4,860,615
2. Match contributed during current Federal fiscal year 698,660
3. Total match available for current Federal fiscal year (Line 1 plus Line 2) $5,559,275
4. Match liability for current Federal fiscal year 15,439
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) $5,543,836

Table 5 – Fiscal Year Summary - HOME Match Report

### Match Contribution for the Federal Fiscal Year

<table>
<thead>
<tr>
<th>Project No. or Other ID</th>
<th>Date of Contribution</th>
<th>Cash (non-Federal sources)</th>
<th>Site Preparation, Construction Materials, Donated labor</th>
<th>Total Match</th>
</tr>
</thead>
<tbody>
<tr>
<td>6th Crestview</td>
<td>2/1/19</td>
<td>175,020</td>
<td>10,599</td>
<td>185,619</td>
</tr>
<tr>
<td>7th Crestview</td>
<td>4/25/19</td>
<td>127,410</td>
<td>11,292</td>
<td>138,702</td>
</tr>
<tr>
<td>8th Crestview</td>
<td>8/21/19</td>
<td>188,440</td>
<td>15,749</td>
<td>204,189</td>
</tr>
<tr>
<td>9th Crestview</td>
<td>11/22/19</td>
<td>153,268</td>
<td>16,882</td>
<td>170,150</td>
</tr>
<tr>
<td>Total Match</td>
<td></td>
<td><strong>644,138</strong></td>
<td><strong>54,522</strong></td>
<td><strong>698,660</strong></td>
</tr>
</tbody>
</table>

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

#### Program Income – Enter the program amounts for the reporting period

<table>
<thead>
<tr>
<th>Balance on hand at beginning of reporting period</th>
<th>Amount received during reporting period</th>
<th>Total amount expended during reporting period</th>
<th>Amount expended for TBRA</th>
<th>Balance on hand at end of reporting period</th>
</tr>
</thead>
<tbody>
<tr>
<td>$306,198.30</td>
<td>$19,678.34</td>
<td>$60,343.43</td>
<td>$0.00</td>
<td>$265,533.21</td>
</tr>
</tbody>
</table>

Table 7 – Program Income
### Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>Minority Business Enterprises</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alaskan Native or American Indian</td>
<td>Asian or Pacific Islander</td>
</tr>
<tr>
<td>Contracts – (based on properties closed in 2019 = 1318, 1322, 1326, 1330 29th Street Road)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>$123,508.10</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sub-Contracts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>Women Business Enterprises</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contracts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>$123,508.10</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sub-Contracts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 8 - Minority Business and Women Business Enterprises

### Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Parcels Acquired</td>
<td>0</td>
</tr>
<tr>
<td>Businesses Displaced</td>
<td>0</td>
</tr>
<tr>
<td>Nonprofit Organizations Displaced</td>
<td>0</td>
</tr>
<tr>
<td>Households Temporarily Relocated, not Displaced</td>
<td>1</td>
</tr>
</tbody>
</table>
**Minority Owners of Rental Property** – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted.

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>Minority Property Owners</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alaskan Native or American Indian</td>
<td>Asian or Pacific Islander</td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*Table 9 – Minority Owners of Rental Property*

<table>
<thead>
<tr>
<th>Households Displaced</th>
<th>Total</th>
<th>Minority Property Enterprises</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alaskan Native or American Indian</td>
<td>Asian or Pacific Islander</td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cost</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*Table 10 – Relocation and Real Property Acquisition*
CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of homeless households to be provided affordable housing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of non-homeless households to be provided affordable housing units</td>
<td>4 (2 Habitat; 2 HAPP)</td>
<td>4 (Habitat)</td>
</tr>
<tr>
<td>Number of special-needs households to be provided affordable housing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4</strong></td>
<td><strong>4</strong></td>
</tr>
</tbody>
</table>

Table 11 – Number of Households

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households supported through rental assistance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of households supported through the production of new units</td>
<td>4 (2 Habitat; 2 HAPP)</td>
<td>4 Habitat sold</td>
</tr>
<tr>
<td>Number of households supported through the rehab of existing units</td>
<td>13 (5 loans; 8 grants)</td>
<td>19 (4 loans, 6 grants; 9 ASI)</td>
</tr>
<tr>
<td>Number of households supported through the acquisition of existing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>17</strong></td>
<td><strong>19</strong></td>
</tr>
</tbody>
</table>

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City’s goal of adding two for-sale units funded with Homes Again Purchase Program Revolving Loan Funds was not met, as the program was cancelled. Habitat for Humanity sold four new-construction houses, however, which met the overall goal of four new units produced.

The Housing Rehab Program had nine applications in 2019; four of those were completed as a grant and two resulted in a loan. Two grants activities and two loan activities started in 2018 were also completed in 2019 and are counted in the above results. Three applicants cancelled prior to work beginning.
Discuss how these outcomes will impact future annual action plans.

The City supports the work of the Greeley-Weld Habitat for Humanity, as it produces units that can be truly affordable to the buyers. It is expected that HOME funds will continue to provide assistance to this homeowner buyer program.

The GURA Board of Commissioners cancelled the Homes Again Purchase Program due to overall market conditions and costs to continue the program. The revolving loan funds from this program have moved to program income and will be used to fund other eligible activities, most likely affordable housing programs.

The Housing Rehab Programs continue to be modestly utilized by low-moderate-income homeowners. The programs are under review due to (1) a lack of contractors interested in dealing with federal regulations, (2) a lack of applications, and (3) environmental concerns (such as lead paint, asbestos, radon, etc.). Costs to test for toxic substances often exceed the limits of the Rehab Programs and what low-moderate-income homeowners can afford, and do not allow for the requested work to be done. Staff expects to have conversations internally and with HUD on whether or not the Rehab Programs, particularly for larger activities done under the loan program, continue to be viable.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

<table>
<thead>
<tr>
<th>Number of Households Served</th>
<th>CDBG Actual</th>
<th>HOME Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low-income</td>
<td>706</td>
<td></td>
</tr>
<tr>
<td>Low-income</td>
<td>152</td>
<td>1</td>
</tr>
<tr>
<td>Moderate-income</td>
<td>7</td>
<td>3</td>
</tr>
<tr>
<td>Non-LMI</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>870</td>
<td>4</td>
</tr>
</tbody>
</table>

Table 13 – Number of Households Served

Narrative Information

Two activities account for the majority of the extremely-low-income households identified in Table 13: the Cold Weather Shelter (with 311 beneficiaries) and the Community Action Collaborative (with 320 beneficiaries). The Senior Resource Services activity that provides free transportation for seniors accounted for 122 of the low-income beneficiaries. Other activities with extremely-low-income clientele included the Greeley Transitional Housing public service activity for a housing case manager, the Guadalupe Community Center case manager support, Rehab Program grants, and residents at multi-family rehab activity development. All 2019 activities served LMI population residents.
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

- The annual Weld Project Connect event provided more than 70 services onsite to persons in need, as well as free system-wide bus service in Greeley and Evans on the day of the event. Areas of service and outreach included health, community assistance, documentation and human services, wellness, education, and veterans.
- The Housing Navigation Center opened in April and provides a location that doubles as the Cold Weather Shelter. The location provides homeless persons with lockers, a place to receive mail, computer access, assessment through the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), assistance with birth certificates and Colorado identification cards, etc. Assessment may also be done at the Greeley Transitional House and the Guadalupe Community Center. A variety of agencies also provides staff at the Housing Navigation Center on a part time basis. There is great network and collaboration among the agencies that serve the homeless population in Greeley.
- Another network is through Connections. What began as a way to assist persons exiting the corrections system is now a general community networking group that focuses on some of the most vulnerable populations, including the homeless.
- The North Colorado Health Alliance has a team of Care Managers with two designated specifically to reach out to the homeless relative to their healthcare needs. North Colorado Health Alliance also continued the Community Action Collaborative, a program that reroutes non-emergent 911 calls to the Collaborative that includes trained mental health professionals and City emergency responders. The Collaborative helps connect homeless persons to services, as opposed to the justice or medical systems.
- Catholic Charities and/or North Colorado Health Alliance do outreach and assessment of homeless to the extent feasible at the cold weather shelter. (Additional information on this shelter is provided below under “emergency shelter”.)

Addressing the emergency shelter and transitional housing needs of homeless persons

Much more than emergency shelter is provided by the Greeley non-profits that operate the local shelters. Extended stay is offered at both the Guadalupe Community Center, the Greeley Transitional House (families experiencing homelessness), and A Woman’s Place (homelessness due to domestic violence). All provide significant levels of services and educational opportunities that focus on self-sustainability.
Emergency Shelter

- The Guadalupe Community Center (Guadalupe) provided 16,598 nights of shelter during 2019. Guadalupe has 24 beds for men, six beds for women, and six separate rooms for families.
  - Single women receive emergency short-term overnight shelter and case management from April 16-October 31 at Guadalupe. In 2019, 95 single women received emergency shelter services.
  - At risk and homeless families are served on an emergency basis at Guadalupe year-round. These self-referrals, referrals from law enforcement services, and referrals from community partners receive very short-term emergency shelter, meals, necessities, and case management assessments and support.
  - A community team, the Emergency Family Coordination Team, made up of the Greeley Transitional House, A Women’s Place, Weld Department of Human Services, Hope at Miracle House, Almost Home, Weld County School District Six, and Catholic Charites work with the case managers at the Guadalupe Community Center and the family to develop a housing plan and resolution of other emergency needs. In 2019, 98 families were served (including 223 children).

- The Greeley Transitional House provided emergency shelter (13,119 individual nights of shelter in 2019) and supportive services to 58 families (93 adults and 146 children). Supportive services included case management, housing navigation and stabilization, and management of rapid rehousing and transitional housing grants.

- A Woman's Place provided emergency shelter for victims/survivors of domestic violence. In 2019, 5,955 nights of shelter were provided to 394 victims, 183 of which were youth under 18 (46%). The average nights per stay was 15.

- The Cold Weather Shelter provided shelter to 235 people January-April 2019 (59 women, 176 men). The shelter re-opened in October 2019, and between opening and December 31, 2019, 311 unduplicated people received shelter (74 women, 237 men). Shelter information is available on the United Way 2-1-1 website in multiple languages. During November and December 2018, 289 unduplicated individuals were served (216 men and 73 women).

Transitional Housing

- The Greeley Transitional House provided three post-shelter housing programs for families. These programs include the Rural Rapid Re-housing program funded by the HUD Continuum of Care, the Camfield Corner Apartments (16 units of transitional housing) funded with the City’s HOME grant, and a case-management-based program at scattered sites funded by Greeley Transitional House. Fifty-three families were served through these programs in 2019.

- The Guadalupe Community Center operated a Transitional Living Extended Stay Shelter program focused on moving the residents to sustainability through income and affordable housing as quickly as possible. The greatest barriers to these goals are the lack of affordable housing and livable wages and the difficulty for someone with a felony record to find housing. Shelter residents can continue to receive services as needed to deal with challenges that come up after transition from the shelter to housing.
Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

While homelessness may be inevitable in some situations, the City and the Northern Colorado Continuum of Care strive for homelessness that is rare, brief, and non-recurring. In Greeley, it has been demonstrated that the best way to help the categories of people noted is through a good, consistent network system. GURA staff frequently receives email blasts from the Connections group previously referenced stating, “I have someone who is...” or “I have someone who needs”, and follows with specific requests to the large community of non-profit and governmental agencies that might be able to help.

Homeless individuals being discharged from North Colorado Medical Center with an acute/complex medical condition can stay at the Guadalupe Community Center for up to 60 days (four beds for men, two for women). Services are outlined in a treatment plan and ordered by a physician; coordination is with NCMC and a Guadalupe Care Coordinator. The intent is to avoid a return to the emergency room or hospital readmission, and ultimately a program outcome of housing. From July thru December 2019, 14 patients were served with 414 days of patient care.

Other services to help individuals and families avoid homelessness are highlighted below (not all-inclusive):

**General Emergency Assistance**

- The Homeless Prevention Program administered by Catholic Charities provided 435 households (700 adults; 714 children) with $38,422 in rent assistance and $153,791 in utility assistance, as well as assisting 409 households with diapers and 100+ persons with LEAP application assistance.
- In 2018, the Greeley Transitional House provided $16,062 in homeless prevention services (rent assistance and case management) to keep 9 households (29 individuals) in their homes. This program is funded through the Colorado Department of Local Affairs’ state income tax check-off program.
- A number of churches and other charitable organizations provided emergency funds for rent and utility assistance.
- United Way of Weld County’s 2-1-1, a free, confidential, multilingual service, provided referral for non-emergency health and human services. In 2019, 7,995 requests for assistance were received, with the highest request being for utility assistance.

**Assistance for Persons with a Criminal Record**

- Jobs of Hope provided young men who were former gang members with training in life skills and job readiness and assisted in finding them employment upon completion of the Jobs of Hope Program. (More than 100 men have been placed in a job since the start of this non-profit.)
• The Guadalupe Community Center provided shelter and support services to those coming out of community correction system (no one on the Sexual Registry or who had committed a recent violent crime).

Assistance for Veterans
• Assistance in obtaining Veterans Administration (VA) benefits is available from the Weld County Veterans Service Office in Greeley. It also acts as a liaison between the VA and veteran with regard to preparation, presentation, and appeal of VA benefits. The service had no cost.
• The Guadalupe Shelter contracts with the VA to serve homeless veterans and help them with healing and self-sufficiency goals.
• The Northern Colorado Veteran Resource Center provided multiple services for veterans.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

• United Way of Weld County continued to implement “Weld’s Way Home” – the local strategic plan to address and prevent homelessness. The plan is dedicated to implementing the “Housing First” model, and all activities that are developed under the Plan’s eight initiatives will have that model as the guiding principal.
• The City of Greeley provided $200,000 for the lease of the building that housed the cold weather shelter. The shelter is in its third cold weather season (2019-2020).
• The cities within the Northern Colorado region of the Balance of State Continuum of Care (Greeley included), utilized coordinated entry to move homeless individuals, families, and youth out of homelessness and into permanent housing as rapidly and smoothly as possible. The coordinated entry system in Northern Colorado has primarily focused on housing veterans, chronically homeless individuals, and families. As of December 31, 2019, 476 veteran households had been assessed for housing with 362 permanently housed, 761 single adults had been assessed with 145 permanently housed, and 331 families had been assessed with 184 permanently housed.
• The coordinated entry system expanded in January 2019 and the process to serve unaccompanied youth was launched. As of December 31, 2019, 39 youth had been assessed and six housed.
• Weld County received $30,000 in Emergency Solutions Grant (ESG) Rapid Re-housing funding to address the need to shorten or prevent homelessness for individuals and families through direct financial services for rent, security deposits, and utilities. The Greeley Transitional House administered the funds on behalf of the County.
• Case management is provided at all shelters in Greeley, with a focus on deterring homelessness or shortening the length of stay when possible. A continuing trend is for shelter residents to be employed, but not able to find affordable housing.
CR-30 - Public Housing 91.220(h); 91.320(j)
Actions taken to address the needs of public housing

During 2019, one single-family house was renovated (kitchen, bath, and flooring). Roofs were replaced on three multi-family buildings and on six single-family houses. Border fencing was replaced at a 42-unit housing complex.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority has a disabled public housing tenant who serves as a Commissioner on the Housing Authority Board. Residents are being recruited to serve on the Tenant Advisory Board. Meetings will be held monthly to discuss concerns residents may have in residences or complex common areas and to work on solutions. Although the average income in Public Housing is $24,000 per year, there are three-five residents whose incomes would allow them to possibly pursue a home purchase. Management encouraged attendance at classes provided by the Colorado Housing and Finance Authority to provide knowledge on homeownership.

Actions taken to provide assistance to troubled PHAs

Not applicable. The Greeley PHA is not troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)
Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City’s most impactful action to address negative effects of public policy serving as barriers to affordable housing was the adoption of the Strategic Housing Plan. It includes strategies and actions that involve public policies, such as

- Amend the development code to promote housing choice
- Develop financial strategies that minimize development costs
- Address the impact of raw water on housing affordability
- Facilitate development of manufactured communities

While it will take some time to implement the steps, the Plan provides a blueprint for ameliorating or removing some of the negative effects of public policy.

Some of the public policies noted in the question do not effect affordable housing in Greeley:
Tax policies affecting land: There are no tax policies that create an affordable housing barrier.

Building codes: The City adopted the 2015 International Residential Codes, to which all residential construction is subject. Building codes do not inhibit the provision and/or maintenance of affordable housing, but are necessary to providing housing standards for safety and habitability (which HUD also expects).

Growth limitations: There are no policies regarding growth limitations in Greeley. Growth is restricted by jurisdictional boundaries, which directs much of the growth west.

Policies affecting the return on residential investment: There are no public policies other than those imposed on properties that received assistance from HUD (CDBG and/or HOME) that affect the return on residential investment.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

See information throughout the CAPER, such as support for the Guadalupe Community Center (homeless), Greeley Transitional House (homeless families), Community Action Collaborative (persons in need that call 911 with non-emergencies), Senior Resource Services (seniors needing transportation), and Habitat for Humanity (for-sale housing to low-income households).

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The GURA staff started discussions with Weld County on they might work together to get new County grant fund into the county communities to reduce lead hazards. No other new actions were taken in 2019 to reduce lead-based paint hazards; however, the City continued to address lead paint hazard issues through the following:

- GURA policy requires that testing for lead-based paint be done by a certified lead-based paint inspector on any house constructed prior to 1978. This policy is applicable when the proposed rehab includes work that would disturb any existing painted surface, such as replacement of windows or doors or exterior painting.
- GURA policy also requires that all rehab work that disturbs a painted surface be performed by an Environmental Protection Agency (EPA) certified Renovation, Repair, and Painting (RRP) Program contractor who has been properly trained in setup, disposal, and clearance of affected areas. Safe handling of all lead-based paint is part of the rehab contract.
- The GURA Manager holds two lead-based paint certifications from the Colorado Department of Public Health and Environment, Air Pollution Control Division. The certifications are Lead-Based Paint Inspector and Lead-Based Paint Assessor. GURA’s Manager attends lead-based paint training when available.
- Applicants for all housing rehab activities are provided information packets about the dangers of lead-based paint when applying for assistance. Both English and Spanish versions of the information are available.
Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Actions are not always specific to poverty-level families, but are meant to help anyone in need. There are CDBG and HOME activities noted throughout the CAPER that provide assistance to agencies working with people looking for help and/or to better their lives. Some of the agencies that might help reduce the number of poverty-level families are listed below. Additionally, the City added an Economic Health and Housing Department that will work to expand the business structure in Greeley and provide more housing opportunities.

- Women2Women provided emergency financial assistance to women by women.
- The Immigrant and Refugee Center of Northern Colorado assisted refugees and immigrants by (in part) teaching English, helping with job searches, and helping with navigation through a new culture.
- Sunrise Community Health provided health and dental care at seven locations in Greeley with payment based on the ability to pay.
- Connections for Independent Living provided assistance and advocacy for individuals with a disability needing to access services and programs. In addition to advocacy, a number of core services are offered: information and referral, peer support, independent living skills training, and assistance in finding and retaining employment.
- North Range Behavioral Health provided a comprehensive set of programs and services for persons with mental illness; addiction; in need of counseling, peer assistance, or crisis support; etc. North Range also provides a continuum of residential services, from staffed homes to supported housing and independent living. No one is denied treatment based on inability to pay.
- Weld Food Bank administered a number of programs to help alleviate hunger and poverty by providing food and food services to people in need.
- The Greeley Interfaith Association and many churches within the faith community provided assistance to those in need, including clothing and meals.

The 2008-2012 American Community Survey estimated that 15.7% of Greeley families live in poverty [with higher numbers for families with children under 18 (26.0%) and families with children under age five (29.4%)]. Poverty percentages reduced in the 2013-2017 ACS (11.9% of all families; 17.3% of families with children under 18; 19.5% of families with children under age five).

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

A strong institutional structure is evident in Greeley in part through the number of agencies and representatives that participate in the Northern Colorado Continuum of Care and the Connections network; the collaboration among agencies providing shelter to working toward housing the homeless; the faith community which provide meals and clothing to those in need; and in the Community Action Collaborative, a partnership with the City and agencies serving those in need. The City does not feel there is need for immediate actions to further develop the local institutional structure.
Efforts to improve the regional (Weld and Larimer Counties) institutional structure specific to working on issues of homelessness came to fruition in early 2020 with HUD’s announcement of the fourth Continuum of Care in the State: Northern Colorado Continuum of Care (NoCOCoC). During the past several years, members of the northern Colorado region questioned the appropriateness for Northern Colorado to remain in the Balance of State Continuum of Care (56 counties considered rural Colorado). Current regional population and projected population growth, as well as the growing infrastructure for providing services and housing to households experiencing homelessness, contributed to Northern Colorado looking and functioning less similarly to other regions in the Balance of State. Agencies and municipalities of the NoCOCoC look at having a separate Continuum of Care for Northern Colorado as a very positive move forward in addressing homelessness region-wide.

As noted elsewhere, the Housing Navigation Center opened to centralize efforts to get people into housing as quickly as possible and provide lockers, mailing address, computers, etc. to homeless persons. Additionally, the Coordinated Assessment and Housing Placement System (CAHPS) operates from United Way of Weld County. The Navigation Center facility also houses the cold weather shelter, which operates mid-November to mid-April. The City currently pays the lease for this facility.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

Coordination between public and private housing and social services agencies has been detailed in a number of places in the CAPER. Rather than restating, please refer to areas with discussions on the Community Action Collaborative, the Connections network, Weld’s Way Home, and the City’s implementation of a Strategic Housing Plan. To the extent possible and appropriate, the City and the Greeley Housing Authority have staff that participate in many of the meetings/groups and help with programs. Additionally, **Weld County United Way** heads the Emergency Food and Shelter Program committee.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

With each of the impediments noted below, there were goals and actions. Please request the full Analysis of Impediments to Fair Housing for 2015-2019 for additional information on impediments identified in Greeley. Briefly, actions to address the impediments were as follows:

**Impediment: Housing Discrimination**
- The City has fair housing information and sample brochures available to CDBG and HOME subrecipients on request.
- An Analysis of Impediments to Fair Housing report in March 2019 that will serve as the guiding fair housing document for the 2020-2024 Consolidated Plan.
Impediment: Language and Culture
- The City adopted a “Limited English Four-Factor Analysis” and Americans with Disabilities Act/Section 504 Effective Communications Policies and Procedures that were effect in 2019.
- Ads associated with the Consolidated Plan process were published in English and Spanish.
- The City of Greeley subscribes to a language interpretation service for employee use when communicating with customers who speak a language other than English.

Impediment: Transportation
- The City gave United Way of Weld County 6,346 adult bus passes via a Memorandum of Understanding, each of which provided for unlimited rides in a 24-hour period, and 528 two-ride passes. Twenty-four-hour passes had a value of $4.50; two-ride passes were each valued at $3.00. Additionally, United Way was given 440 paratransit trip tickets. Non-profit agencies may request passes for their clientele from United Way.
- Greeley Evans Transit (GET) continued to offer a number of free/discount programs, including free rides to School District 6 students with identification (to school, activities, and back home), discounted fares for seniors and individuals with disabilities, and discount pass booklets further reduce costs for seniors and persons with disabilities.
- Habitat’s Crestview Subdivision is near a bus stop.

Impediment: Lack of affordable housing units disproportionately affecting some protected classes
- The Single-family Housing Rehab grant program installed ramps for accessibility through the Retired Seniors Volunteer Program (RSVP), which provided labor to construct the ramps at a materials-only cost.
- The following provided support for families in transitional housing:
  o Sixteen townhouse-type units for families exiting the Greeley Transitional House shelter.
  o The City Council-approved 2019 grants to the Greeley Transitional House and Guadalupe Community Center for public services that support the homeless as they move toward finding permanent housing.
  o See Section CR-25 for additional information on transitional housing at the Guadalupe Community Center.
- Four Habitat for Humanity houses sold in 2019 in the Crestview Subdivision.

Impediment: Higher mortgage loan denial rates for Hispanic/Latino households
- Aggregate reports from the Housing and Mortgage Disclosure Act (HMDA) for the Greeley MSA were reviewed. The reports showed applications of people of the Hispanic ethnicity denied at the rate of 27.05% vs. non-Hispanic people denied at 17.21%. While the City has no control over loan originations and no information as to why loans were denied, the data will continue to be monitored.
CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

The City developed a CDBG monitoring plan that includes several layers of activity review, as briefly described below. The monitoring plan is unchanged from last year. Upon request, the full monitoring plan is available.

- At receipt of applications, all proposed activities are reviewed to ensure they further the priorities of the Consolidated Plan, meet a National Objective, and are eligible CDBG activities. Submitting agencies are required to certify they are in compliance with federal requirements as part of the application. The City strives to ensure applicants are informed with respect to the federal obligations by offering two optional-but-encouraged technical assistance meetings to discuss federal obligations prior to the applicant accepting CDBG funds and also makes staff available for consultation upon an applicant’s request.

- Throughout the activity, GURA staff maintains close contact with the subrecipients of CDBG funds. Staff is involved in procurement, bidding language (Section 3; Minority and Women Owned Business statements), and contracting (when applicable); meets individually with the awardees to review the City agreements; and makes great effort to notify agencies that staff is available for technical assistance upon request.

- There is also a limited desk review at the time draw requests are received: Draw requests and invoices are reviewed, beneficiaries are counted, and it is verified that the draw is consistent with the City’s agreement.

- By policy, annual on-site monitoring is conducted on a minimum of 10% of the agencies that received funding during that fiscal year with the goal of on-site monitoring of no fewer than three subrecipients, subject to staff modification based on activities and subrecipients. The Guadalupe Community Center and Greeley Transitional House were monitored in 2019. Staff determined it was unnecessary to monitor the other subrecipients as they were experienced or had recent monitorings.

Minority-and Women-Owned Business Outreach

- (The information, with the exception of the date, in the following narrative is unchanged from the 2015 CAPER.) The City does not discriminate against minority or women-owned businesses during the bidding process and has awarded bids to a number of contracts to minority- and women-owned businesses over the years. During 2019, the City contracted with a women-owned business for environmental assessment and clean up. Greeley is not a large community and has a small pool of contractors willing to bid on work that involves Federal funds. No bidder is discouraged.

When advertising an Invitation to Bid, both the City and GURA include a statement encouraging minority- and women-owned businesses to apply. (They also include a Section 3 statement.) A
sample bid invitation by GURA follows: “Bids are being solicited for (insert job) by Greeley Urban Renewal Authority (GURA). Bids will be accepted until (time) on (date). Bidders must meet qualifications set by GURA. Women- and minority-owned businesses are encouraged to participate. Section 3 requirements for opportunities for low- moderate-income residents and businesses may apply. For more information call (GURA office phone number).”

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The 2019 CAPER was available for public comment as follows:

- Meeting of the Citizens Committee for Community Development – March 3, 2020; four members attended.
- Public Comment period from March 5 – March 25, 2020.
- Available for review on City’s website.
- Non-profit agency partners with the City received notice of the availability of the CAPER and were encouraged to provide comments and share it with their clientele.
- The GURA Board of Commissioners public hearing to recommend that City Council accept the report – March 11, 2020. There were XX members of the public at the meeting; no comments were offered.
- The City Council accepted the report with no further comment on April 7, 2020.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The Federal code noted (24 CFR 91.520(c) states the CAPER must evaluate the City’s progress in meeting its specific objectives for reducing and ending homelessness. The questions in CR-25 mirror what is required under 24 CFR 91.520(c). To avoid duplication, please refer to CR-25 for specifics on how the City is progressing with the issue of homelessness.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No
CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City has 10 multi-family developments that include HOME units. City policy is a rental monitoring schedule that follows old HOME regulations (every year for projects with 26 or more units, every other year for projects with five to 25 units, and every three years for projects with one to four units). Monitoring is conducted annually in July/August; all developments due for monitoring (the four, noted All HOME units are monitored annually for rent compliance; the four below were scheduled for and had on-site monitoring. Other than minor maintenance issues, there were no other concerns.

- Chinook Wind
- Plaza del Milagro
- Plaza del Sol
- Stagecoach Gardens

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Of the 19 HOME units monitored in 2019, four tenants were black and 15 were Caucasian. Ten identified as Hispanic. Additionally, eight units were leased by female head-of-households.

Other:
- Owners of the HOME units advertise with the Fair Housing symbol
- Resident Selection Criteria and/or leases include a non-discrimination statement
- The City received no complaints of discrimination in 2019

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

IDIS activity 305 received $30,837.78 in HOME program income; IDIS activity 323 received $29,505.65. The activities were new construction of for-sale housing. One sold to a family with income considered moderate (51-80%) and the other to a family with low income (31-50%). One family identified as multi-racial, the other as White/Hispanic. Both were female-head-of-household.

Describe other actions taken to foster and maintain affordable housing. 91.220(k)

Goals identified in the Analysis of Impediments to Fair Housing include
• Increasing awareness and understanding of fair housing and housing discrimination
• Improving access to services for person who have Limited English Proficiency
• Improving access to public transportation
• Increasing the supply of affordable and accessible housing
• Promoting homeownership opportunities in City programs and in support of Habitat for Humanity

Other actions with regard to addressing obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies were discussed in CR-35. See responses in that Section.
Attachments

- Map – Redevelopment District
- Map – Census Tracts with low-income percentages
- HOME Recapture Policy
- CAPER Ad – English
- CAPER Ad – Spanish
Attachment 1 – Redevelopment District Map
Attachment 2 – Census Tract Map (With Percentage of Low- Moderate-Income Residents)

CPD’s 2014 Updated LMISD

February 28, 2018

% of Block Group that is LMI
Attachment 3 – Recapture Policy

STANDARD OPERATING POLICIES & PROCEDURES

HOME INVESTMENT PARTNERSHIP PROGRAM
SUBSIDY, SALES PRICE, AFFORDABILITY, and RECAPTURE of FUNDS
FOR NEW CONSTRUCTION OF OWNERSHIP UNITS

Reference HOME Investment Partnership Program (HOME) regulations at 24 CFR 92, particularly 24 CFR 92.254 (“Qualification as affordable housing: Homeownership”) and 24 CFR 92.503 (“Program income, repayments, and recaptured funds”) with respects to HOME funds assisting the development of homeownership units.

5/17/19 – These policies, as stated below, were Attachment 5 – HOME Affordability/Recapture Policy for Home-ownership for the 2019 Action Plan

These Policies and Procedures are to comply with the HOME regulations noted above and are for the Crestview Subdivision being developed by the Greeley Area Habitat for Humanity (the Developer).

POLICIES

I. Sales Price and Subsidy

A. The Developer can submit a HOME application and request HOME funds on behalf of their buyers that is the lesser of

   1. The gap in buyer purchase financing
   2. The total of City fees for water and sewer taps plus building permit fees

   The GURA Board of Commissioners has determined this is the maximum direct subsidy to be offered to buyers in the Crestview Subdivision. Buyers must meet all qualifications of the HOME and Developer’s homeownership programs.

B. The intent of the HOME investment is to reduce the price of the home and is hereinafter called the “direct subsidy” or “HOME investment”.

C. The sales price of the HOME to be acquired using a HOME investment cannot exceed the New Homes HOME/HTF Purchase Price Limit (also known as the HOME Affordable Homeownership Limits) as set by the U. S. Department of Housing and Urban Development (HUD) on an annual basis. Further restriction on the sales price may be determined by the Developer to comply with its own homeownership program, but at no time can the sales price exceed the amount provided by HUD.

II. Affordability

HUD expects HOME funds to be utilized for affordable housing for households earning 80% or less of the Area Median Income (AMI) and for the home to remain affordable. To keep the housing affordable, regulations impose affordability requirements that stay with the property for a time period, called the “affordability period”.
A. **Affordability Period.** The length of the affordability period is based on the amount of the HOME investment in the home to be purchased and is the period during which the property must remain affordable or the homebuyer is subject to the return of the HOME investment. The table below shows HUD’s minimum affordability periods by HOME investment. The City has chosen to utilize the periods defined in the table and will not impose a longer period of affordability. Subrecipients, Owners, Developers, and Community Development Housing Organizations (CHDOs) cannot opt out of applying these policies to its homebuyer program and, further, must assist the City in enforcing the City’s Affordability and Recapture policy.

<table>
<thead>
<tr>
<th>HOME Funds in Project</th>
<th>Affordability Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;$15,000</td>
<td>5 years</td>
</tr>
<tr>
<td>$15,000 - $40,000</td>
<td>10 years</td>
</tr>
<tr>
<td>&gt;$40,000</td>
<td>15 years</td>
</tr>
</tbody>
</table>

B. **Enforcement of the Affordability Period.** There are two means by which the HOME investment is protected during the period of affordability and which will restrict the way in which the home can be used and sold, as outlined in these policies and protected by recorded legal documents. The diagram below provides a visual of the enforcement means, both of which are described by policy following the diagram.

<table>
<thead>
<tr>
<th>Purpose: Maintain Affordability and Protect the HOME Investment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Repayment</strong></td>
</tr>
<tr>
<td>100% of the HOME investment is subject to repayment if the</td>
</tr>
<tr>
<td>home does not <em>retain affordability</em> throughout the</td>
</tr>
<tr>
<td>affordability period. <strong>Affordability</strong> is defined by</td>
</tr>
<tr>
<td>regulation and is stated in the policies for repayment below.</td>
</tr>
</tbody>
</table>

See III. Section A below for policy.

C. **Affordability Term.** The affordability period begins after project completion. (“Completion” is defined as the date the activity is closed in IDIS.) Legal documents will designate the affordability term as 5 years, 10 years, or 15 years depending on HOME investment plus three months to allow the City time to draw the funds and close the activity.

III. Policies to Retain Affordability

A. **Repayment.** The HOME regulation at 24 CFR 92.503(b)(1) states, “Any HOME funds invested in housing that does not meet the affordability requirements for the period specified in 24 CFR 92.254 (Qualification as affordable housing: Homeownership) must be repaid by the participating jurisdiction.”

HUD defines **affordable** under the HOME program as meeting the following:

1. The housing must be single-family housing.
2. The housing must be modest, as follows:
   a. Utilization of the HOME Affordable Homeownership Limits provided by HUD (annually) ensure this requirement.
3. The housing must be acquired by a homebuyer whose family qualifies as a low-income family, i.e. earning no more than 80% of AMI. (The Developer may further restrict income through its program policies.)

4. The housing must be the principal residence throughout the period of affordability.

To enforce the affordability regulation, the City will require prompt repayment of all of the HOME investment in the following instances:

1. The home is no longer the principal residence of the homebuyer. The homebuyer must occupy the home at all times and provide an annual residency certification to remain in compliance with affordability. Non-return of the annual residency certification is considered being out of compliance. Under the residency requirement, the following are not allowed:
   a. Anything that causes the homeowner to not reside in the home, including leasing the unit to another household or transferring title to another household (for example through a Quit-Claim Deed).

2. Reconstruction of the home to accommodate multiple families (it must remain a single-family residence).

2. Misrepresentation of homebuyer’s information (for example, it comes to light that family size or income were reported falsely).

3. The first mortgage is refinanced.

The City will secure the affordability period by a Beneficiary Use Covenant/Homeowner Agreement.

The City will exercise due diligence and make every effort, in conjunction with the Developer, to work with the homeowner to return the home to affordability compliance and avoid repayment of the HOME funds. Due diligence steps will include the following:

1. Through the Developer Agreement, the Developer shall be responsible for initially contacting the homeowner, reminding them of their obligations to Beneficiary Use Covenant/Homeowner Agreement, and will attempt to facilitate returning the unit into affordability compliance.
   a. The Developer will send annual certification letters to the homeowners, which must be signed, dated, and return acknowledging continuation of principal residency.

2. If the homebuyer does not respond to the Developer, contact with the homeowner will be initiated by and for the City through the City Attorney’s Office.

3. The Developer and City will work with the homeowner to return the property to compliance through the following:
   a. Allowing a lease term to expire and continuing with the affordability after expiration (in the case where a home has been rented and a tenant has a lease). The affordability period will be extended past the affordability term by the length of any lease.
   b. Providing reasonable time (determined by the City and the homeowner) to return the home to single-family status.
   c. Allowing the homebuyer to sell the property under the recapture provisions below.

Misrepresentation or refinancing require repayment without a means to remedy.

4. Remedy. If the Developer and/or the City, through working with the homeowner, are not able to return the home to affordability compliance, the City will contact HUD with regard to the repayment
of HOME funds to determine how they should be handled. Additionally, the City will take the following steps:

a. Per the terms of the Beneficiary Use Covenant/Homeowner Agreement, the City will pursue collection by whatever means are allowable under the law, the costs of which will be the responsibility of the homeowner(s).
   - If the homeowner is unable to repay the any or all of the HOME funds immediately, the City will allow for the homeowner to enter into a loan agreement for repayment of the funds. In this case, the City will repay HOME from its General Fund and set up loan for repayment of the HOME investment with a term not to exceed the original term of the Beneficiary Use Covenant/Homeowner Agreement.

b. Per the terms of the Developer Agreement, secondary collection will be pursued by the City from the Developer in any amount uncollectable from the homeowner.

c. Right of Legal Remedy in Pursuing Satisfaction of Affordability Period. In the event the homeowner does not satisfy the full terms of affordability and make repayment of HOME funds, the City of Greeley reserves the right to pursue any remedy allowable under HUD regulations and the law for full payment by any legal means necessary. Payment of legal or any other fees will be the responsibility of the homeowner.

B. Recapture. A homeowner cannot sell the home during the period of affordability without triggering requirements that some or all of the HOME investment be returned. The HOME regulations at 24 CFR 92.524-Qualification as affordable housing: Homeownership govern instances where a homeowner wants to sell the property during the period of affordability. By policy, the City has chosen the recapture of funds (24 CFR 92.524(a)(5)(ii)-Recapture) as the means it will use to enforce regulations in case of a sale. “Sale” includes voluntary or involuntary (foreclosure) sales. Voluntary sales include a short sale or deed-in-lieu of foreclosure.
   - A short sale is a voluntary sale in a situation where the bank that holds the mortgage agrees to take less than the full payoff for the mortgage in full satisfaction of the mortgage. This is commonly sought by a homeowner who wants to sell but whose house is “upside down” or where the mortgage balance exceeds the fair market value of the property. The homeowner is voluntarily selling for less than the fair market due to the homeowner’s current situation.
   - The City has further determined that foreclosed upon homeowners will follow the recapture provision outlined below. (The City will contact HUD in the case of foreclosure and any direction for HUD that deviates from this must be followed.)

1. First Right of Refusal. The Developer shall have a First Right of Refusal Clause in their legal documents (per the Developer Agreement). Should they Developer choose to exercise that Right, the following apply:
   a. The Developer can resell the property to a new buyer who meets income and all other qualifications of the HOME Program.
   b. The remaining time on the Beneficiary Use Covenant/Homeowner Agreement can be transferred to the new buyer, provided the new buyer agrees to accept that sale condition and they meet all HOME requirements.
2. HUD offers options to enforce the recapture provisions; the City has chosen to recapture the full amount [(see regulation 92.254(a)(4)(ii)(A)(1)), (option one in the cited regulation). “Full amount” is defined as the net proceeds of the sale (sales price minus non-HOME loans on the property and any closing costs associated with the sale). At no time will the City attempt to recapture more funds than are available from net proceeds. The net proceeds provision includes voluntary and involuntary (foreclosure) sales.

The following scenarios further describe how the City will recapture funds. To clarify policy, an example is provided following each situation, in red. These are examples only and do not reflect true amounts.

a) **If there are net proceeds greater** than the loan for HOME funds, the full HOME subsidy is recaptured, and the remaining proceeds belong to the homeowner entirely and are considered to be the fair return on the homeowner’s investment.

**EXAMPLE:** The homeowner decides to voluntarily sell the property, and it subsequently sells for $200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total $150,000. The homeowner thus has net proceeds of $50,000. The HOME direct subsidy was $30,000. From the net proceeds of $50,000, the City will recapture the HOME $30,000 direct subsidy and the homeowner retains $20,000.

b) **If a sale results in less proceeds available than are required** to meet the demands of all liens, including the HOME direct subsidy, any amount available from net proceeds up to the amount of the remaining affordability loan. That amount will be considered full payment of obligations under the affordability/recapture agreement for the homebuyer.

**EXAMPLE:** The homeowner decides to voluntarily sell the property, and it subsequently sells for $200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total $175,000. The homeowner thus has net proceeds of $25,000. The HOME direct subsidy was $30,000. The entire $25,000 will be recaptured from the homeowner to satisfy the HOME requirements; the homeowner will keep none of the net proceeds.

c) **If there are no net proceeds** from the sale, repayment will not be required from the homeowner and the affordability period will be considered satisfied for that party.

**EXAMPLE:** The homeowner decides to voluntarily sell the property, and it subsequently sells for $200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total $200,000. The homeowner thus has $0.00 net proceeds. The HOME direct subsidy was $30,000, of which $0.00 will be recaptured. Likewise, there will be not be net proceeds left for the homeowner.

d) In the case of a short sale, the City (or the Developer, as applicable) has the option of whether or not to approve the short sale. Recapture will be based on net proceeds only, and follow the applicable provisions set forth above.

e) Foreclosure.

   - **When the City and/or Developer are made aware of a pending foreclosure, they will to the greatest extent feasible provide the homeowner with resources, including counseling options, the Colorado Foreclosure Hotline information, and other guidance as is available.**
Recapture, in the case of foreclosure, is based on net proceeds alone. If there are no net proceeds, the affordability restriction is terminated and there is no further obligation to the homeowner or the City. (Subject to HUD approval, as noted above.)

3. Subject to HUD approval, the City will use any recaptured funds for other HOME-eligible activities.

4. The HOME Investment and recapture provisions will be secured through a Deed of Trust and Promissory Note. This is in addition to the Beneficiary Use Covenant/Homeowner Agreement that secures affordability and the repayment required if a homeowner is not in compliance with the affordability requirements.

   a. If the homeowner resides in the property for the full affordability period and meets all of the terms of the Deed of Trust, Promissory Note, and Beneficiary Use Covenant/Homeowner Agreement, the City will release all documents at its expense at the expiration of the legal documents.

PROCEDURES

It is recommended that the City and the Developer use the Procedures below as a checklist during the construction and subsequent sale of housing units. These procedures are only for implementing the recapture policies. Other procedures are noted in the Developer Agreement.

Applications for HOME funds are available from the City year-round, as funds are available. Procedures below begin once an application has been approved for funding by the GURA Board of Commissioners.

1. Developer – Provide a written preliminary buyer financing worksheet that identifies a gap in available financing for the homeowner.

   a. City – Based on numbers, provide a preliminary, written HOME funds commitment to the Developer at which time HOME funds will be committed.

2. Developer - Articulate affordability requirements (repayment of funds) and recapture provisions to potential purchasers at various stages in the process.

   a. City - Meet with the potential buyer(s) to review the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to provide additional assurance that the buyer is aware of the affordability period and instances by which the HOME investment may have to be returned (repayment) or recaptured (sale) and the considerations and requirements of each scenario.

3. Developer – As construction completion nears, provide the City with closing information (per the Developer Agreement).

4. Developer – Finalize the buyer financing worksheet with final figures to determine the exact amount of HOME funds to be involved in the property.

5. City – Prepare the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to secure the affordability period. Ensure the document is recorded following closing. The expense of recordation is the City’s with regard to its legal document (HOME program expense).

6. City – At its expense, release the Beneficiary Use Covenant, Deed of Trust, and Promissory Note when the affordability period expires.